

2<sup>nd</sup> 80's Fire  
Deer Park, Texas  
Waste Management Plan  
Version 1.0

Intercontinental Terminals Company – Deer Park  
23 March 2019

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## WASTE MANAGEMENT PLAN MANAGEMENT OF CHANGE

Change 001			
Description of Change (include sections & page numbers):			
	Name/Position	Signature	Date Signed
Prepared By:			
Approved By:			
Change 002			
Description of Change (include sections & page numbers):			
	Name/Position	Signature	Date Signed
Prepared By:			
Approved By:			
Change 003			
Description of Change (include sections & page numbers):			
	Name/Position	Signature	Date Signed
Prepared By:			
Approved By:			

## 1.0 INTRODUCTION AND PURPOSE

This Waste Management Plan was prepared on behalf of Intercontinental Terminals Company LLC., supporting Unified Command (UC) to provide a plan for the management of waste during the response to the 2<sup>nd</sup> 80's Fire (See **Attachment A** for general location).

This Waste Management Plan establishes and describes procedures and protocols to be followed by responders for all spill response materials, recovered and generated. The plan provides for the management, transportation, interim storage and final disposal of the expected waste streams and categories that may be generated.

The collection, storage, transportation, treatment and disposal of waste will be conducted in a manner that is both safe and environmentally sound.

## 2.0 HEALTH AND SAFETY

All activities identified in this Waste Management Plan are subject to the Incident-Specific Health and Safety Plan.

## 3.0 WASTE MANAGEMENT BEST PRACTICES

The following best practices must be followed in the management of wastes generated in a spill response effort:

- a. Dispose or manage wastes and recoverable materials in permitted or otherwise authorized locations. Unauthorized disposal or management will not be tolerated.
- b. Obtain Safety Data Sheets (SDSs) for all known products and other incident derived materials (ex: fire-fighting foam) involved in waste management (the SDS's for the materials involved will be provided in **Attachment B**).
- c. Reduce waste generation whenever practical. This is known as waste minimization or pollution prevention.
- d. Reuse or recycled materials whenever practical. This not only lowers a consumption of raw materials, it also eliminates the need for waste disposal. Recycling in reuse of recovered oil and oil and water is the preferred option.
- e. Avoid co-mingling wastes of different classifications. For example, never place non-hazardous wastes in the same container as hazardous waste. In addition, keep recyclable material separate from nonrecyclable waste. It may be difficult or impossible to separate wastes after their co-mingled.
- f. Maintain good housekeeping practices. Employees and contractors should maintain neat, clean-up work areas to reduce the need for additional cleanup and the associated waste.
- g. Properly store wastes, especially hazardous waste, to avoid releases to soil, water, or air, and to avoid consumption by wildlife until they can be appropriately managed.
- h. Clearly identify waste containers. Use a label or other means to clearly identify the contents of containers of hazardous, nonhazardous and inert wastes.
- i. Document quantities and disposition of all hazardous and non-hazardous wastes as instructed in this plan. Waste tracking is required for all wastes. This information will be included in the final report delivered at the conclusion of response activities.
- j. Recovered liquids (product, water, sludge) should be collected and stored in as large a container as possible (UN approved drum, tote tank, tanker truck, barge, etc.) to maximize dewatering potential, facilitate uninterrupted recovery, and to minimize equipment decontamination requirements.
- k. Communicate your ideas to the Operations Section Chief for waste minimization waste management improvements supervisors and fellow employees in different areas.

- l. Maintain security at all locations where waste is stored.
- m. The Environmental Unit is responsible for determining whether any regulatory permits (e.g. NPDES) or plans (SWP3 or SPCC Plan) are required for areas where waste is stored.

## 4.0 WASTE CHARACTERIZATION

Classification of the wastes/materials will be determined based both upon generator knowledge and sampling analytical results. Currently, the estimated volume of each waste stream and reclaimable/recyclable materials are unknown due to the nature of the incident.

Waste profiles will be created for solid waste (debris, soil, pads, sorbents, PPE, vegetation) using generator knowledge and further verified via a well-developed sampling program.

### 4.1 Waste Profile Evaluation and Methodology

Representative sampling may be done on each waste stream for proper characterization, as deemed necessary, and used in generation of waste profiles. If sampling is conducted, one in every 10 roll-off boxes for solid media will be sampled for analysis. The recommended method of analysis is by collecting a five-point composite from selected roll-off box. The five-point composite provides a good representation of the impacted waste stream from the front and rear right corners, the front and rear left corners, and in the center of the roll off box. The composite samples should be collected with a stainless-steel spade and placed into a designated bucket where it will be homogenized and recollected into appropriate sample containers.

Sampling will be conducted by representatives with the Environmental Unit; however, this activity will be coordinated with Safety and Operations in order to make certain that access is safe and the collection of samples is fully representative of the generated waste. Once collected, the samples will be preserved as described in Section 4.2.

Liquid waste samples will be analyzed for toxicity leachate leaching procedure volatile organic compounds (TCLP-VOCs), TCLP semi-volatile organic compounds (TCLP-SVOCs), as well as, Texas 11 Metals, reactivity, corrosivity, and ignitability (RCI), and polyfluoroalkyl substances (PFAS). Composite solid waste samples (solids) will be analyzed for TCLP, PFSA, RCI and metals. All samples will be submitted to a NELAP accredited and state certified laboratory.

### 4.2 Sampling Handling Procedures

Samples will be placed into clean, laboratory-supplied sample containers appropriate for the intended analysis for each media type and labeled with a sample identification number, sampler name, and sample date and time, and immediately placed in a cooler on ice or approved sample storage location pending laboratory analysis. The method of analysis will be filled out on the appropriate paperwork, to be filled out by the sampler, and left with the sample. The sample will be packaged, labeled, retained in an approved storage, and documented in an area which is free of impact and provides for secure storage. A custody seal will be placed on the sample-containing cooler and/or lid of glass jar, and chain-of-custody procedures will be maintained from the time of sample collection until arrival of the laboratory transporter to protect sample integrity. Shipping or transporting of the sample to the laboratory will be done within a timeframe such that recommended holding times are met. The sample will be collected in adequate volumes in a sample container of a broad variety to ensure that any future requested analyses can be performed given the collected sample container types.

### 4.3 Quality Assurance

Sampling will be carried out in a manner that is compliant with regulatory guidelines and accepted standard methods to ensure that samples are collected without the effects of accidental cross- or

systematic contamination. To provide QA for the proposed sampling event, the following sampling, analysis, and data validation procedures will be performed:

#### 4.3.1 Laboratory QA

Laboratory quality control procedures will be conducted in a manner consistent with relevant state and federal regulatory guidance. Deliverables will contain the supporting documentation necessary for data validation. Internal laboratory quality control checks will include method blanks, matrix spikes (and matrix spike duplicates), surrogate samples, calibration standards, and laboratory control standards (LCSs).

#### 4.3.2 Data Validation

Validation of the data generated by the laboratory performing the analyses will include at a minimum sample holding times, accuracy, precision, contamination of field generated or laboratory method blanks, and surrogate compound recovery. Accuracy will be determined by evaluating LCS and MS recovery. Precision will be determined by evaluating laboratory duplicate samples, where two sub-samples are taken from a single, homogenous sample from the same container, and are taken through the same preparative and analytical procedures to evaluate analytical precision. Level II data validation will be performed on 100% of submitted samples. Level IV data validation may be performed on up to 10% of submitted samples.

#### 4.4 Decontamination Procedures

Decontamination procedures will be in accordance with the Decontamination Plan which will be submitted under a separate cover letter.

#### 4.5 Data Analysis

The results of the sample analysis will be compared to appropriate Federal and State regulatory standards. The results of laboratory analyses will be provided to the IC.

#### 4.6 Records Management

Records management refers to the procedures for generating, controlling, and archiving project-specific records and records of field activities. Project records, particularly those that are anticipated to be used as evidentiary data, directly support current or ongoing technical studies and activities, and provide historical evidence needed for later reviews and analyses, will be legible, identifiable, retrievable, and protected against damage, deterioration, or loss on a centralized electronic database. Handwritten records will be written in indelible ink. Records will likely include, but are not limited to, the following:

Ground field notebooks on pre-numbered pages, sample collection forms, personnel qualification and training forms, sample location maps, equipment maintenance and calibration forms, chain of custody forms, maps and drawings, transportation and disposal documents, including waste manifests and bills of lading), reports issued as a result of the work, procedures used, correspondences, and any deviations from the procedural records. Documentation errors will be corrected by drawing a single line through the error, so it remains legible and will be initialed by the responsible individual, along with the date of change, and the correction will be written adjacent to the error.

All hazardous waste will be shipped on a hazardous waste manifest in compliance with RCRA. These waste manifests will be retained for 3 years.

## 5.0 POTENTIAL WASTE CATEGORIES

Waste Stream	Sources	Materials Generated
<b><u>Non-Hazardous: Most would be considered Class 1 material</u></b>		
Liquid Material	Skimming, vacuuming, equipment decon	<ul style="list-style-type: none"> <li>Recovered or skimmed mixtures (diked area, ditch, Tucker Bayou, Ship Channel, and tanks)</li> <li>Wash waters from cleaning equipment</li> <li>Decon waters</li> </ul>
Solids	Recovery and Remediation ops	<ul style="list-style-type: none"> <li>Sediment, vegetation, woody material</li> <li>Empty foam totes</li> </ul>
Sorbents	Recovery operations	<ul style="list-style-type: none"> <li>Contaminated sorbent materials</li> </ul>
PPE	Worker protection	<ul style="list-style-type: none"> <li>Outer garments</li> </ul>
General Household Trash	Daily activities	<ul style="list-style-type: none"> <li>Food and beverage debris</li> </ul>
<b><u>Hazardous*</u></b>		
Waste determination made on case by case basis (e.g. soil, liquids exhibiting corrosive, toxic, or flammability characteristics, liquids with a listed constituent)		
<ul style="list-style-type: none"> <li>D001 organic hydrocarbon solution with brine water and firefighting foam</li> <li>Hazardous wastewater treated onsite</li> </ul>		

## 6.0 WASTE MATERIAL MANAGEMENT

Description of potential material/Waste	Waste Category	Method of Removal	Temporary Storage	Ultimate Disposal
Contaminated Water	Class 1 /Hazardous Waste	Pump to vac trucks, removed from outfalls, drains, bayou, and ship channel	WWTP Tanks, 100-28, 80-18, other portable containers	Treatment via onsite WWTP and discharged under TPDES permit Clean Harbors, TX US Ecology, TX
Uncontaminated Household Trash	Non-Hazardous Solid Waste	Dumpsters provided by Waste Management (WM)	Various staged locations	Waste Management
Debris/other solids / sorbent materials	Class 1/ Hazardous Waste	Poly lined Roll Off Containers	Roll off boxes in staging areas	US Ecology, TX HPP, TX Rineco, AR
PPE	Non-Hazardous Solid Waste/Class 1 Solid Waste	Poly lined Roll Off Containers	Roll off boxes in staging areas	Waste Management, TX Rineco, AR
Absorbents	Class 1 solid waste/hazardous waste	Poly lined Roll Off Containers	Roll off boxes in staging areas	Waste Management, TX Rineco, AR

Materials identified as hazardous waste *	Hazardous Solid Waste	Poly lined Roll Off Containers	Roll off boxes in staging areas	Clean Harbors, TX Rineco, AR US Ecology, TX
Materials identified as hazardous waste *	Hazardous Liquid Waste	Pump to vac truck and move to onsite storage tanks	100-28, 80-18, other portable containers	Clean Harbors, TX US Ecology

\*See Section 4 for Waste Characterization and profiling. The waste profile for all identified hazardous waste shall be prepared within 30 days, and hazardous waste shall be stored on site for no longer than 90 days.

## 7.0 STAGING AREAS

A Waste Staging Area has yet to be determined for solid waste including soil/vegetation.

Bagged class 1 and hazardous waste is to be disposed of in separate roll off boxes. Other solid waste will be containerized at the staging areas in poly-lined Roll off boxes. Solid waste will be separated according to contents.

Liquid wastes will be pumped into 130bbl vac trucks where feasible and transferred to onsite storage tank 100-28 and 80-18. These may be separated into waste that is classified as hazardous and waste that is nonhazardous. Other liquid waste may be sent to the WWTP for storage and then follow the process for onsite wastewater treatment.

Waste containers will be clearly identified. Each container is to be visibly labeled on all sides indicating the contents (e.g. impacted soil, contaminated vegetation/debris, PPE, etc.) and the date the container began collecting waste.

The waste flow process will consist of receiving waste at the designated staging areas or WMU's, sorting waste to separate items that can be recycled or reused, and packing/labeling/manifesting.

## 8.0 DOCUMENTATION AND STORAGE AREA CONTROLS

The Hazardous Waste Operator will be responsible for coordinating all daily waste stream activities. Coordination activities include, but are not limited to, the following:

- Perform special projects and other tasks requested by the Responsible Party
- Continually analyze situations and make or recommend judgmental decisions to maintain Customer assets in the best safety, compliance and business position possible.
- Regularly (weekly) inspect that all containers are in good condition, boxes are properly tarped and free of liquids that could cause delays or problems during shipment and notify waste management personnel when containers need to be overpacked or the contents transferred to a more suitable container. Report any discrepancies.
- Inspect all containers and confirm labels are in place and correct prior to the loading of the transportation vehicle to ensure that the load(s) will be received at the disposal facility without discrepancy.
  - Continually look for ways to reduce the total waste stream.
  - Assist with the identification, inventory, and proper storage of all waste materials at waste staging areas.

Daily verbal reports are to be provided for the following:

- Quantity of each category of waste generated for that operational period;
- Quantity of each category of waste stored on site; and
- Quantity of each category of waste transferred.

Waste at the consolidation sites will be controlled when entering and leaving the staging areas. The following form will be used to document waste management. This form is to be updated as needed but at least once daily and forwarded at the end of the week unless otherwise requested to the environmental team.

### Staging Area Log Example

Date Onsite	Date Full	Date Offsite	Contractor	Type	Location	Container No.	Product	Tank #	Customer	Notes/Comments
			Cameron	RO	4 Dock	2006	Copper	*	ITC	Road leading to the 1 dock
			Sprint	RO	S. Drum Shed	4154	Debris	*	ITC	From construction, south of 4th 100's
			Sprint	RO	S. Drum Shed	TB40156	Debris	*	ITC	From construction, south of 4th 100's
			Cima	RT	Lead Shed	30-17	Haz.	*	ITC	Plant solid waste, hazardous

### Waste Disposal Log Example

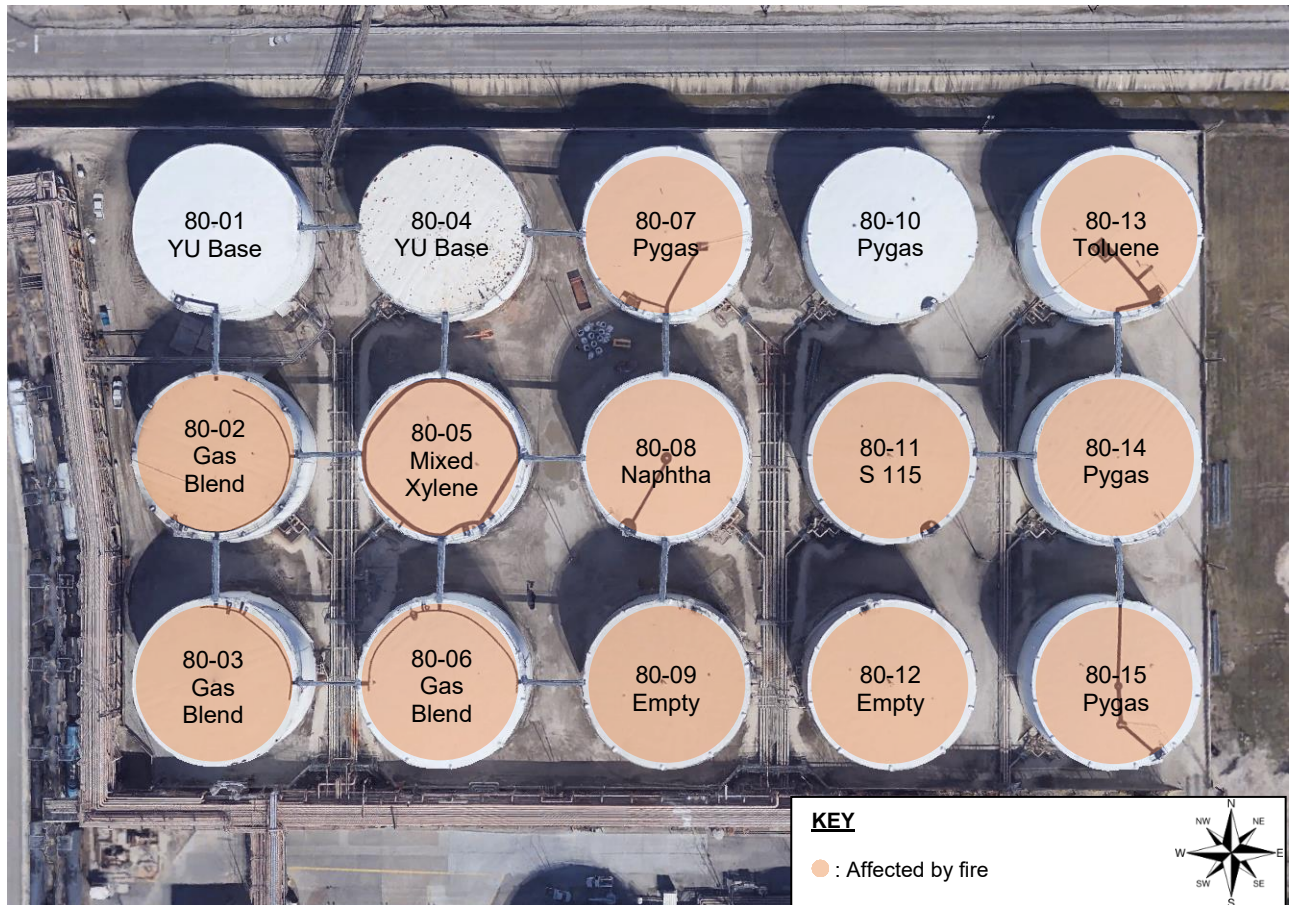
Date	Manifest #	Transporter	EP A ID	Class	Designated Facility	EPA/ SWT	Waste Code	PUKFD Codes	Waste Description	QTY	UOM	Management Codes	Return Date	Box #	Container Type
3/5/2019	01258841 JJK	Cima	543 21	H	Clean Harbors	6789 1	012399 9H	D001	UN3077, Hazardous Waste Solid, n.o.s.	3000	P	H040		30-20	1 CM

## 9.0 ADDITIONAL ASSISTANCE

If additional help or assistance is required, immediately contact your on-scene safety, Hector Cadena – Lead Safety, or environmental representative, Hunter Willis – Environmental Systems Supervisor, Mike Gaudet – Environmental Compliance Manager, or contact Carl Holley – VP of SHES, Regulatory Compliance, and Safety, or David Wascome – VP of Operations.



## Attachment A: General Incident Location



## Attachment B: Product Safety Data Sheets (SDS)

Attached are the SDS's for the following products/tanks:

- Gasoline Blendstock
  - 80-02
  - 80-03
  - 80-06
- Mixed Xylene
  - 80-05
- SN 115 (Base Oil)
  - 80-11
- Pyrolysis Gasoline
  - 80-07
  - 80-14
  - 80-15
- Naphtha
  - 80-08
- Toluene
  - 80-13
- Universal Gold AR-FFF
- Other Foams (do not have SDSs at this time)



## Attachment C: Situation Map

